

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GENESIS MARTINEZ, on behalf of herself
and all others similarly situated,

Plaintiff,

v.

RALPH LAUREN CORPORATION,

Defendant.

Case No.: 1:21-cv-01181

Hon. District Judge Edmund Chang

**JOINT MOTION FOR ENTRY OF STIPULATION TO REMAND ACTION TO THE
CIRCUIT COURT OF KANE COUNTY, ILLINOIS**

Plaintiff Genesis Martinez (“Plaintiff”) and Defendant Ralph Lauren Corporation (“Defendant”) (collectively, the “Parties”), by and through their undersigned counsel, hereby jointly move for entry of a stipulation remanding this Action to the Circuit Court of Kane County, Illinois, Sixteenth Judicial Circuit. In support of the instant stipulation, the Parties state as follows:

WHEREAS, this Action was originally filed in the Circuit Court of Kane County, Illinois, Sixteenth Judicial Circuit on January 5, 2021;

WHEREAS, Plaintiff alleges that Defendant violated sections 15(a) and 15(b) of the Illinois Biometric Information Privacy Act, 740 ILCS § 14/1, *et seq.* (“BIPA”);

WHEREAS, on March 2, 2021, Defendant removed this Action to the United States District Court for the Northern District of Illinois; and

WHEREAS, the Parties have reached a settlement that, if finally approved, will fully and finally resolve all claims asserted against Defendant in this Action;

WHEREFORE, solely for the purpose of effectuating settlement, the Parties hereby move for this Court to enter the Parties’ stipulation to remand this matter to the Circuit Court of Kane

County, Illinois, Sixteen Judicial Circuit, with each party to bear its own costs and fees. A Proposed Order (in the form attached hereto as Exhibit A) will be emailed to the Court's chambers' email address in accordance with the Court's Standing Order.

Dated: March 29, 2022

Respectfully Submitted,

PLAINTIFF GENESIS MARTINEZ, on
behalf of herself and all others similarly
situated

**DEFENDANT RALPH LAUREN
CORPORATION**

By: /s/ David M. Poell
One of Its Attorneys

By: /s/ Carl Malmstrom
One of Her Attorneys

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